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EDWIN C. EASTWOOD, JR.
(1929 – 2006)

August 4, 2016

PETER A. SCANDARIATO
MEMBER N.J. AND D.C. BARS

REPLY TO: New Jersey

ERIC STEINBERG
MEMBER N.J. AND N.Y. BARS

LISA K. EASTWOOD
MEMBER N.J. AND N.Y. BARS

VIA ECF

Honorable Pamela K. Chen
United States District Court
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Marasco v. American Expediting Company, Inc., et al.*
Civ. Action No. 16 – CV – 00232 (PKC)(JO)

Dear Judge Chen:

I represent Defendant Adam Dally (“Defendant Dally”) in the above-referenced action. Defendant Dally has requested a pre-motion conference in connection with a pre-answer motion to dismiss he intends to make on statute of limitation grounds. The Court granted the request and scheduled the conference for August 16, 2016 at 10:30 am.

I write to respectfully request that the Court reschedule the conference. In my August 1, 2016 letter to Your Honor I advised the Court that I had long standing vacation plans and would be unavailable August 15, 2016 through August 26, 2016.

Honorable Pamela K. Chen
August 4, 2016
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I have spoken with my adversary, Mr. Joseph Lipari, who has consented to reschedule the conference. We are both available any time from August 29th forward. Thank you in advance for your kind consideration of my request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'ES', with a long, sweeping horizontal line extending to the right.

Eric Steinberg

Cc: Hon. James Orenstein, US Magistrate Judge (via ECF)
Jason P. Sultzer, Joseph Lipari, Jean Sedlak and Brett Zinner,
Plaintiff's counsel (via ECF)
Andrew M. Spurchise, Leslie M. DiBenedetto and Kevin R. Vozzo
Counsel for Defendants American Expediting Co., Inc. and V. Finnegan (via
ECF)